



SEALED

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES SANDERS,
 aka "Cheeze,"

Defendant.

**SEALED
CRIMINAL INDICTMENT**

2:22-cr- 212

VIOLATION:

21 U.S.C. §§ 846, 841(a)(1),
 841(b)(1)(A)(viii) – Conspiracy to Distribute
 a Controlled Substance

18 U.S.C. § 933 – Trafficking Firearms

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii),
 841(b)(1)(B)(viii) – Distribution of a
 Controlled Substance

18 U.S.C. §§ 922(o) and 924(a)(2) –
 Possession of a Machine Gun

18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D) –
 Engaging in the Business of Dealing in
 Firearms Without a License

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Distribute a Controlled Substance
(21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)(viii))

From a time unknown but no later than July 20, 2022, and continuing up to and including September 13, 2022, in the State and Federal District of Nevada,

CHARLES SANDERS
aka "CHEEZE,"

defendant herein, and others known and unknown, knowingly combined, conspired, confederated, and agreed with each other to distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(viii).

COUNT TWO

Trafficking Firearms
(18 U.S.C. § 933)

Beginning from a time unknown but no later than July 20, 2022, and continuing up to and including on or about September 13, 2022, in the State and Federal District of Nevada,

CHARLES SANDERS
aka "CHEEZE,"

defendant herein, knowingly transferred and disposed of firearms to another person, in or affecting interstate or foreign commerce, knowing or having reasonable cause to believe that the use, carrying, and possession of said firearms by receipt would constitute a felony, as defined in 18 U.S.C. § 932(a); all in violation of Title 18, United States Code, Section 933.

COUNT THREE

Illegal Possession of a Machinegun
(18 U.S.C. §§ 922(o) and 924(a)(2))

1 On or about August 25, 2022, in the State and Federal District of Nevada,

2 CHARLES SANDERS
3 aka "CHEEZE,"

4 defendant herein, knowingly possessed and transferred a machinegun, to wit: a Juggernaut
5 Arms JT-9 privately made AR-15 style machine gun, in violation of Title 18, United States
6 Code, Sections 922(o) and 924(a)(2).

7 **COUNT FOUR**

8 Distribution of a Controlled Substance
9 (21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

10 On or about August 25, 2022, in the State and Federal District of Nevada,

11 CHARLES SANDERS
12 aka "CHEEZE,"

13 defendant herein, knowingly and intentionally distributed 50 grams or more of a mixture
14 and substance containing a detectable amount of methamphetamine, a Schedule II
15 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
16 841(b)(1)(B)(viii).

17 **COUNT FIVE**

18 Illegal Possession of a Machinegun
19 (18 U.S.C. §§ 922(o) and 924(a)(2))

20 On or about September 1, 2022, in the State and Federal District of Nevada,

21 CHARLES SANDERS
22 aka "CHEEZE,"

23 defendant herein, knowingly possessed and transferred machineguns, to wit: a DPMS A-15
24 machinegun bearing serial number FFH213817; and a P80 privately made firearm, bearing
no serial number with a "Glock Switch," in violation of Title 18, United States Code,
Sections 922(o) and 924(a)(2).

COUNT SIX

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

1 On or about September 13, 2022, in the State and Federal District of Nevada,

2 CHARLES SANDERS
3 aka "CHEEZE,"

4 defendant herein, knowingly and intentionally distributed 50 grams or more of actual
5 methamphetamine, a Schedule II controlled substance, in violation of Title 21, United
6 States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

7 **COUNT SEVEN**

8 Illegal Possession of a Machinegun
(18 U.S.C. §§ 922(o) and 924(a)(2))

9 On or about September 13, 2022, in the State and Federal District of Nevada,

10 CHARLES SANDERS
11 aka "CHEEZE,"

12 defendant herein, knowingly possessed and transferred a machinegun, to wit: a Wilson
13 Combat .223 multi-caliber firearm, bearing serial number WCPL15784, in violation of
14 Title 18, United States Code, Sections 922(o) and 924(a)(2).

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COUNT EIGHT

Engaging in the Business and Dealing in Firearms Without a License
(18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D))

Beginning from a time unknown but no later than July 20, 2022, and continuing to
and including on or about September 13, 2022, in the State and Federal District of Nevada,

CHARLES SANDERS
aka "CHEEZE,"

defendant herein, not being a licensed dealer, importer, and manufacturer of firearms
within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the
business of dealing in, importing, and manufacturing firearms, in violation of Title 18,
United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

DATED: this 12 day of October, 2022.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney


KIMBERLY SOKOLICH
Assistant United States Attorney